

EXHIBIT A

Justice Court, Las Vegas Township

Complaint, 17C014770
Filed July 13, 2017

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5 JUSTICE COURT, LAS VEGAS TOWNSHIP

6 CLARK COUNTY, NEVADA

7 MID-CENTURY INSURANCE COMPANY,)
as subrogee of Sherman Kappe,)

8 Plaintiffs,)

9 v.)

10 JAMES ANTHONY SMITH; MISTER)
11 JONATHAN JACKSON III; ANDERSON)
MOORE; BUDGET RENT A CAR)
12 SYSTEM, INC.; and DOES I through X,)
inclusive,)

13 Defendants.)

CASE NO. 17C014770
DEPT. NO. Department #: LVJC 4

14 COMPLAINT

15 COMES NOW Plaintiff MID-CENTURY INSURANCE COMPANY and hereby
16 complains and alleges as follows:

17 1. Plaintiff MID-CENTURY INSURANCE COMPANY is, and at all times
18 mentioned herein was, doing business in and by virtue of the laws of the State of Nevada.

19 2. Defendant JAMES ANTHONY SMITH is, and at all times mentioned herein was,
20 a resident of the State of Nevada.

21 3. Defendant MISTER JONATHAN JACKSON III is, and at all times mentioned
22 herein was, a resident of the State of Texas.

23 4. Defendant ANDERSON MOORE is, and at all times mentioned herein was, a
24 resident of the State of Nevada.

25 5. Defendant BUDGET RENT A CAR SYSTEM, INC. is, and at all times
26 mentioned herein was, doing business in and by virtue of the laws of the State of Nevada.

27 6. All the facts and circumstances that give rise to the subject lawsuit occurred in the
28 State of Nevada.

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7. Defendants DOES I through X are unknown at this time, and may be individuals, partnerships or corporations. Plaintiff alleges that each of the Defendants designated herein as DOE is responsible in some manner for the damages herein alleged. Plaintiff requests leave of the Court to amend this Complaint to name the Defendants specifically when their identities become known.

8. On or about November 30, 2015, Plaintiff had in effect a policy of insurance in the name of Sherman Kappe, which contained therein a property damage clause; that said policy of insurance provided therein that Plaintiff would have the right of subrogation against any party causing injury to the named insured or damages to the named insured's property.

9. On or about November 30, 2015, and at times mentioned, Defendants JAMES ANTHONY SMITH and MISTER JONATHAN JACKSON III were operating vehicles involved in the subject incident. Defendants, including DOES I through X, were the owners, employers, family members and operator of a motor vehicle while in the course and scope of employment and/or family purpose, which was entrusted and driven in such a negligent and careless manner so as to cause damage to the named insured's property.

10. As a direct and proximate result of the negligence of Defendants, the insured's property was damaged, lessened and depreciated in the amount of \$7,790.23. As a further direct and proximate result of the negligence of the Defendants, Plaintiff was obligated to pay other incidental damages including, but not limited to, loss of use of the insured property.

11. Plaintiff has paid for the loss and seeks subrogation.

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

1. For damages and depreciation of Plaintiff's insured's property plus incidental damages in the amount of \$7,790.23;

2. For Plaintiff's costs herein incurred and expended;

3. For reasonable attorney's fees; and

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4. For such other and further relief as the Court may deem just and proper.

DATED this 13th day of July, 2017.

LAW OFFICE OF LISA A. TAYLOR

/s/ Lisa A. Taylor, Esq.

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